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8	Attorneys for Plaintiff	
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION	
12		
13	UNITED STATES OF AMERICA,) No. 06-00173 SI VRW	
14	Plaintiff, PROPOSED] ORDER AND STIPULATION	
15	v.) EXCLUDING TIME FROM APRIL 14, 2006 v.) TO MAY 1, 2006 FROM THE SPEEDY TRIAL ACT CALCULATION	
16	APPLE GATE, (18 U.S.C. § 3161(h)(8)(A))	
17	Defendant.	
18		
19	The parties appeared before the Honorable Susan Illston on April 14, 2006. With the	
20	agreement of the parties, and with the consent of the defendant, the Court enters this order	
21	documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), from	
22	April 14, 2006 to May 1, 2006. The parties agreed, and the Court found and held, as follows:	
23	1. The defendant agreed to an exclusion of time under the Speedy Trial Act. Failure to	
24	grant the requested continuance would unreasonably deny defense counsel reasonable time	
25	necessary for effective preparation, taking into account the recent production of discovery, the	
26	possibility that more discovery will be provided in the near future, and the exercise of due	
27	diligence.	
28	2. Given these circumstances, the Court found that the ends of justice served by	
	STIPULATION AND ORDER 06-00173 SI	

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excluding the period from April 14, 2006 to May 1, 2006, outweigh the best interest of the public and the defendant in a speedy trial. Id. § 3161(h)(8)(A).

5. Accordingly, and with the consent of the defendant, the Court ordered that the period from April 14, 2006 to May 1, 2006, be excluded from Speedy Trial Act calculations under 18

4. The Court scheduled a new status date of May 1, 2006, at 10:00 a.m.

IT IS SO STIPULATED.

U.S.C. § 3161(h)(8)(A) & (B)(iv).

The matter is set for Initial Appearance before Judge Vaughn R Walker on May 16, 2006 at 10:30 a.m. in courtroom 6.

DATED: 4/15/06	/S/
	TRACIE L. BROWN
	Assistant United States Attorney

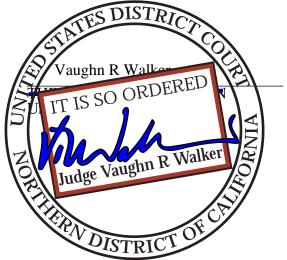
DATED: /S/ ELIZABETH FALK

Attorney for APPLE GATE

IT IS SO ORDERED.

Attorney for APPLE GATE

DATED: April 24, 2006



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